

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.

SUITE 1200

WASHINGTON, D.C. 20036

(202) 857-3500

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
DAVID A. LAFURIA
MARILYN SUCHECKI MENSE
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA
STEVEN M. CHERNOFF

* NOT ADMITTED IN D.C.

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ

OF COUNSEL

JOHN J. MCAVOY
J.K. HAGE III⁺
LEONARD S. KOLSKY⁺
HON. GERALD S. MCGOWAN

TELECOPIER
(202) 857-5747

<http://www.fcclaw.com>

WRITER'S DIRECT DIAL

January 15, 2004

(202) 828-8434

tslamowitz@fcclaw.com

Via Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Edge Wireless Licenses, LLC.
E911 Interim Report

Dear Ms. Dortch:

Edge Wireless Licenses, LLC ("Edge") hereby files its January, 2004 E911 Interim Report regarding its wireless Enhanced 911 (E911) deployment and implementation status. Edge, as a Tier III carrier previously reported its intention to deploy a handset-based technology. Unfortunately, A-GPS handsets for GSM have not become available and handset manufacturers have not announced definitive timelincs to offer such A-GPS equipped handsets for GSM.

Edge recognizes the importance for public safety of Phase II E911 service. For the past several years, Edge has been actively working with the PSAPs in its service area regarding the deployment of Phase II E911 service. It has been recognized by APCO for its commitment to public safety. In May of 2002, Edge deployed Phase II in four counties in Oregon using a GPS battery solution from Airbiquity, working with those county PSAPs and Oregon Emergency Management.

Edge provides digital wireless service in rural Oregon, Idaho, Wyoming, and California and currently operates both TDMA and GSM networks. Edge has completed overlaying its TDMA network with GSM and turned on its GSM network for roam-only in ID/WY, and both roam and home service in OR/CA.

As set forth below, Edge provides its responses to the information requested by the Wireless Telecommunication Bureau in its Public Notice released June 30, 2003 (Public Notice, DA 03-2113, "Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers").

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

In April 2001, Edge received a PSAP request from Oregon Emergency Management (OEM) for the following six counties; Washington, Clackamas, Multnomah, Marion, Polk, and Lane. Edge does not offer service in any of those counties. In October 2002, OEM stayed its request for Phase II E911 service, determining that there are too many unresolved issues surrounding Phase II E911 service at this time. Edge has not received notice for service in any of its Oregon service area.

On March 30, 2001, Edge received a letter from the State of California, Telecommunications Division, indicating that it will begin deploying Phase I and Phase II Service on a scheduled basis throughout California. Subsequently, Edge was informed that the State of California expects to have installed the necessary CPE to allow them to be Phase II capable by the end of 2004 for the following three (3) counties where Edge provides commercial service: Mendocino, Trinity, and Lake. The State of California also expects to install the necessary CPE to be Phase II capable during late 2005 for the following five (5) counties where Edge provides wireless service: Del Norte, Humboldt, Siskiyou, Lassen, and Plumas.

With respect to the counties in Idaho and Wyoming where it currently provides commercial service, Edge has not received a valid Phase II PSAP request.

2. The carrier's specific technology choice (*i.e.*, network-based or handset-based solution, as well as the type of technology used).

At this time, Edge plans on deploying a handset-based solution for its GSM network. Edge continues to believe that, given the rural nature of its markets, a network-based solution may not be viable as it will not meet the Commission's Phase II accuracy and reliability standards.

3. Status on ordering and/or installing network equipment.

Edge is offering Phase II service in four counties of Oregon using the Airbiquity solution. However, since no PSAPs are Phase II capable for that solution in any other Edge area, Edge will not deploy the Airbiquity solution anywhere else. Edge has installed phase II compatible Nortel GSM network equipment. Edge intends to order and install the required E911 phase II specific software and equipment at our Medford, Oregon switch after A-GPS handsets are commercially available and distributed to Edge subscribers.

4. **If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.**

ALI-capable handsets for TDMA or GSM networks are not currently available, and Edge has no agreements in place to obtain ALI-capable handsets.

5. **The estimated date on which Phase II service will first be available in the carrier's network.**


Edge currently provides Phase II service in four counties in Oregon using the TDMA/Airbiquity solution. Edge's GSM network can be equipped to provide Phase II service and anticipates that Phase II service will be available in the second half of 2005.

6. **Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.**

Edge had anticipated that GPS-assisted handsets would be available in sufficient quantities for its GSM customers well in advance of that date. It now appears, however, that the availability of A-GPS handsets will be delayed. Edge continues to believe that a handset-based solution is the best solution for its rural markets, both in terms of accuracy and in terms of cost. Yet, the delay in availability of A-GPS handsets combined with the need to convert its existing TDMA subscriber base to ALI capable equipment makes it unlikely that Edge will achieve 95% penetration by December 31, 2005, using a handset-based solution.

In the event you have any questions with respect to this matter, please contact the undersigned.

Sincerely,



Thomas Gutierrez
Todd Slamowitz

CERTIFICATE OF SERVICE

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 15th day of January, 2004, sent by hand-delivery, a copy of the foregoing Enhanced 911 Tier III Interim Report of Edge Wireless Licenses, LLC to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

David Solomon, Chief*
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-C485
Washington, D.C. 20554

D'wana Terry, Chief*
Public Safety and Critical Infrastructure Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C133
Washington, D.C. 20554

Jennifer Tomchin, Legal Advisor*
Public Safety and Critical Infrastructure Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C400
Washington, D.C. 20554

Eugenie Barton*
Public Safety and Critical Infrastructure Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A104
Washington, D.C. 20554

Robert M. Gurss
APCO International
1725 DeSales Street, NW, #808
Washington, D.C. 20036

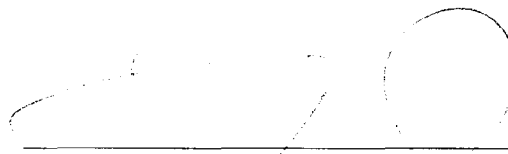
- 2 -

James R. Hobson
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Ave. N.W., Suite 1000
Washington, D.C. 20036
Counsel for NENA and NASNA

John Ramsey, Executive Director
APCO International, Inc. World Headquarters 351 N. Williamson Blvd.
Daytona Beach, FL 32114-1112

Terry Peters, Executive Director
NENA
4350 N. Fairfax Drive, Suite 750
Arlington, VA 22203

Evelyn Bailey, Executive Director, NASNA
Vermont Enhanced 9-1-1 Board
94 State Street
Drawer 20
Montpelier, VT 05620-6501



Steven McCord

*via hand-delivery

